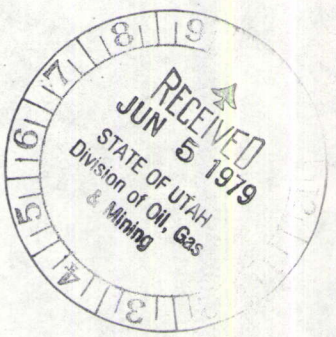
D. W. LITCHFIELD & ASSOCIATES, INC.

MINING AND LAND PLANNING CONSULTANTS



May 23, 1979

Office of the Area Mining Supervisor
Conservation Divison
8426 Federal Building
125 South State Street
Salt Lake City, UT 84138

ATTENTION: Allen L. Vance, Mining Engineer

Dear Mr. Vance:

In reply to your letter of May 4, 1979, to Mr. Ira Holley, concerning Federal phosphate lease SL-051785-U-030044. I am enclosing an addendum to the mining plan submitted from this office, in Mr. Holley's behalf.

On Tuesday, May 22, 1979, Tom Low and Bob Nielsen (the writer), met with Martin Poulsen and Carlos Lopez of the United States Forest Service, on the property. We discussed at length the area to be mined. Mr. Poulsen and Mr. Lopez are knowledgeable and congenial men, and the assistance they provided was most helpful.

The additional information you requested will be answered in the order they are addressed in your letter and it is anticipated that this information will be of sufficent detail to satisfy those pertinent regulations (30 CFR 231.10).

Respectfully yours,

Robert Nielsen
Technical Vice-President
D. W. Litchfield & Associates, Inc.

cc Martin Poulsen
Douglas Litchfield
Robert Nielsen

Enclosure

RN/bs

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Addendum to Proposed Mining Plan
For Utah Phosphate Company (Ira Holley) Designated Operator
Federal Phosphate Lease SL-051785-U-030044

231.10(c)(2) The location of the mine as contained in the main body of the mining plan is correct as NW 1/4 SE 1/4 SE 1/4 Sec 22 Tp 8S R4E SLBM. Whoever prepared the map apparently interpretted the mine location as being at the end of a road in error.

Enclosed you will find a revised copy of the map with the additonal information and labeling as requested.

231.10 (c)(3) The existing road was constructed many years ago and is passable by four wheel equipment. The existing road will be utilized and graded as needed. Some places will have to be rewidened, where the banks have sluffed in, to provide adequate width for the passage of small (8-10 ton) dump trucks along the road. Also several turns need to be widened to provide adequate turning radius to assure the safety of drivers and hauling equipment. Proper erosion barriers will be constructed along the road to control any run off and will follow accepted Forest Service practice. Brush will be trimmed back instead of dozed, except in those areas as previously explained. It is expected that such distrubance will be kept to only that necessary to restore the existing road to usable condition.

231.10 (c)(4) Should dusting along the road prove to be a problem a water truck will be utilized to wet the roads surface. Only that amount of water needed to control dusting will be used and should present no drainage problems. If any significant spillage of ore should occur it will be cleaned up and removed to the shipping area, which will be located on private ground. Servicing and fueling of equipment will be done from a service truck and any spillage of fuels or

lubricants will be cleaned up and disposed of in such a manner as to avoid pollution. No fuels or lubricants will be stored at the minesite. A porta-potty will be utilized to provide sanitation for the two man crew.

231.10 (c)(5) Runoff water should pose no real challenge. The pit area is situated at the top of a ridge and covers an area of about two acres. There is no area above the pit on which water can collect. Adjacent to the pit on the north side is a heavily vegetated area with terraces left from previous operations. This area is now very stable. Several small terraces will be constructed after the ore is removed, to divert any runoff to this area where it will be dispersed and absorbed naturally. The operation will not require the use of water and there are no ground water sources or active streams close enough to the mine to present problems.

The plate containing the phosphate lies along the upper extremity of a ridge. Of uniform thickness it conforms to the general contours of this area and can be easily removed with little change in the contour or appearance of the mountain. Contours will feather naturally into the ridge line on the south edge and butt against a small outcrop on the north, leaving a smooth rocky surface behind, much as it was before mining activities began.